

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

VERY REVEREND GEORGES F. DE LAIRE, J.C.L.,

Plaintiff,

v.

Case No. 1:21-CV-00131-JD

GARY MICHAEL VORIS; ANITA CAREY; ST.  
MICHAEL'S MEDIA a/k/a CHURCH MILITANT,  
and MARC BALESTRIERI,

Defendants.

**KATHLEEN H. KLAUS AND NEIL B. NICHOLSON'S  
MOTION TO WITHDRAW AS COUNSEL FOR GARY MICHAEL VORIS, ANITA  
CAREY AND ST. MICHAEL'S MEDIA, INC.**

Pursuant to Local Rule 83.6(d), Kathleen H. Klaus and Neil B. Nicholson (jointly, "Counsel") state as follows for their Motion to Withdraw as Counsel for Gary Michael Voris, Anita Cary and St. Michael's Media, Inc.:

1. Recent events that have transpired in the litigation have created an unwaivable conflict between Counsel and their clients, under New Hampshire Rule of Professional Conduct 1.7(a).
2. Counsel believes this conflict bars them from taking any further action on behalf of their clients.
3. Counsel has notified their clients of their intent to file the instant motion and withdraw as counsel.
4. Counsel has also advised their clients that, if the Court grants the instant motion, they will need to secure substitute counsel.

WHEREFORE, there being no just cause otherwise, Kathleen H. Klaus and Neil B. Nicholson respectfully ask the Court to enter an order allowing them to withdraw as counsel for Gary Michael Voris, Anita Carey and St. Michael's Media, Inc.

Respectfully submitted,

MADDIN, HAUSER, ROTH & HELLER, P.C.

NICHOLSON LAW FIRM, PLLC

/s/ Kathleen H. Klaus

Kathleen H. Klaus (MI Bar #67207)

*Pro Hac Vice*

Attorney for Michigan Defendants

28400 Northwestern Hwy, 2<sup>nd</sup> Floor

Southfield, MI 48034

(248) 359-7520

[kklaus@maddinhauser.com](mailto:kklaus@maddinhauser.com)

/s/ Neil B. Nicholson

Neil B. Nicholson (NH Bar #18341)

Attorney for Michigan Defendants

58 North State Street

P.O. Box 4137

Concord, NH 03302

(603) 856-8441

[neil@nicholson-lawfirm.com](mailto:neil@nicholson-lawfirm.com)

Dated: August 10, 2023